

EXHIBIT D

EPSTEIN
BECKER
GREEN

Attorneys at Law

James P. Flynn
t 973.639.8285
f 973.639.8931
jflynn@ebglaw.com

November 19, 2013

VIA ECF AND REGULAR MAIL

Honorable Anne E. Thompson, U.S.D.J.
Clarkson S. Fisher Building & U.S. Courthouse
402 East State Street
Trenton, NJ 08608

Re: Ross University School of Medicine, et al. v. Behzad Amini, et al.
Case No.: 3:13 cv 06121

Dear Judge Thompson:

We represent the plaintiffs in the above-referenced action and write to inform the Court of a recent development that we submit underscores the urgency of entering in full the order requested in our still-pending application for preliminary injunctive relief.

Yesterday, we received a troubling email from the Compliance Officer of TUCOWS, Inc. (“TUCOWS”) relating to the infringing websites at issue in this litigation. TUCOWS is one of the restrained domain name registrars identified in Your Honor’s Order Providing for Continuing Injunction dated October 28, 2013 (“Order”). TUCOWS informed us that an individual named “Jeff Green” had contacted the company seeking to have the infringing websites unlocked. The individual identifying himself as “Jeff Green” advised TUCOWS that his telephone number was (602) 980-0900. Not surprisingly, a review of our own correspondence with Mr. Amini, the docket sheet and defendant’s filings reveal that this number is defendant Behzad Amini’s telephone number. We have attached the relevant correspondence

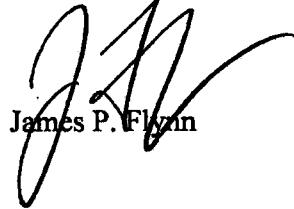
Hon. Anne E. Thompson, U.S.D.J.
November 19, 2013
Page 2

for TUCOWS as Exhibit A and B, and copies of the referenced Amini correspondence (as Exhibit C) and docket sheet (as Exhibit D).

Mr. Amini's conduct is plainly in violation of paragraph 2 of the Order and raises serious questions as to what other steps he may be taking to circumvent the restraints already imposed in this matter by the Court's Orders dated October 16, 2013 and October 28, 2013 (ECF #s 6 and 11). Should this conduct continue, we will initiate contempt proceedings against Mr. Amini.

Under the circumstances, we respectfully request that the Court enter the Preliminary Injunction Order submitted on October 25, 2013, a copy of which is attached as Exhibit E (a copy of which was previously submitted). Leaving these domains any longer outside the full control of plaintiffs will only encourage such conduct.

Respectfully,



James P. Flynn

JF:mtk
Attachments

cc: Behzad Amini (via email)

EXHIBIT A

Attachments: untitled-[1.2].html; MOL-1404.pdf; Exhibits.pdf; MOL-12(b).pdf

-----Original Message-----

From: Tucows Disputes [mailto:disputes@opensrs.org]
Sent: Monday, November 18, 2013 9:32 AM
To: James P. Flynn
Subject: [Fwd: Re: [Fwd: Re: [Fwd: Ross University School of Medicine et al. v. Behzad Amini et al-- ORDER REGARDING WEBSITE REGISTRATIONS]]]

Hi James,

We received the email below with attachments from the registrant/reseller of the domain names.

I had a discussion on the phone with "Jeff Green" last week and he was very angry and made me aware that he is now preparing to litigate against Tucows because we locked his domains.

The domains will remained locked.

Regards,

Sara Scruton | Compliance Officer | Tucows.com
96 Mowat Ave. | Toronto | ON | Canada | M6K 3M1
Phone: 416.535.0123 x1655
Fax: 416-531-2516
Toll Free Intl: +800.371.6992
Email: disputes@opensrs.org
<http://opensrs.com/>

Original Message

Subject: Re: [Fwd: Re: [Fwd: Ross University School of Medicine et al. v. Behzad Amini et al— ORDER REGARDING WEBSITE REGISTRATIONS]]
From: "Jeff Green" <green973271@yahoo.com>
Date: Wed, November 13, 2013 9:22 pm
To: "Tucows Disputes" <disputes@opensrs.org>

See attached motion 1404, 12b(2), 12(b3)

On , Jeff Green <green973271@yahoo.com> wrote:

See Attached Response

On Wednesday, November 13, 2013 1:11 PM, Jeff Green
<green973271@yahoo.com> wrote:

602-980-0900

On Wednesday, November 13, 2013 12:58 PM, Tucows Disputes
<disputes@opensrs.org> wrote:

Hello,

We received an email (below) from info@rossu.net, however the email address bounced.

Do you have a phone number that we could contact you so we can discuss the issue?
?

Regards,

Sara Scruton | Compliance OfficerÂ | Tucows.com
96 Mowat Ave. | Toronto | ON | Canada | M6K 3M1

Phone: 416.535.0123 x1655

Fax: 416-531-2516

Toll Free Intl: +800.371.6992

Email: disputes@opensrs.org

<http://opensrs.com/>

> We are filing a lawsuit against Tucows. We need the address to forward

> the legal document.

>

>

>

>

> On 2013-10-16 15:48, Tucows Disputes wrote:

>> Hello,

>>

>> Please find court documents attached, and let us know how you will
>> proceed.

>>

>>

>> Please be aware that you have agreed to indemnify Tucows, and I have
>> taken

>> the privacy off the domains.

>>

>> <http://www.opensrs.com/docs/contracts/exhibita.htm>

>>

>> Section 13

>> INDEMNITY. You agree to release, indemnify, and hold Tucows, its
>> contractors, agents, employees, officers, directors and affiliates,

>> ICANN,

>> the applicable registries and their respective directors, officers,
>> employees, agents and affiliates harmless from all liabilities, claims

>> and

>> expenses, including attorney's fees, of third parties arising out of

>> or

>> relating to the registration or use of the domain name registered in

>> your

>> name, whether used by yourself, licensed to a third party or pursuant

>> to

>> the Whois Privacy Service, including without limitation infringement

>> by

>> you or a third party with access to your Account

Identifier and

>> Password.

>> You also agree to release, indemnify and hold us harmless pursuant to

>> the

>> terms and conditions contained in the applicable Dispute Policy. When

>> we
>> are threatened with suit by a third party, we may seek written
>> assurances
>> from you concerning your promise to indemnify us; your failure to
>> provide
>> those assurances may be considered by us to be a breach of your
>> Agreement
>> and may result in the suspension or cancellation of your domain name.
>> This
>> indemnification obligation will survive the termination or expiration
>> of
>> this Agreement.
>>
>> Section 22 WHOIS PRIVACY SERVICE
>>
>> Right to Suspend and Disable. We shall have the right, at our sole
>> discretion and without liability to you or any of your
Contacts,
>> suspend
>> or cancel your domain name and to reveal Registrant and Contact Whois
>> Information in certain circumstances, including but not limited to the
>> following: (i) when required by law; (ii) in the good faith belief
>> that
>> disclosure is necessary to further determination of an alleged breach
>> of a
>> law; (iii) to comply with a legal process served upon Tucows; (iv) to
>> resolve any and all third party claims including but not limited to
>> ICANN's or a Registry's dispute resolution policy; (v) to avoid
>> financial
>> loss or legal liability (v) to avoid financial loss or legal
>> liability;
>> (vi) if we believe that you
or one of your Contacts is using the Whois
>> Privacy Service to conceal involvement with illegal, illicit,
>> objectionable or harmful activities; or (vii) to
transmit SPAM,
>> viruses,
>> worms or other harmful computer programs.
>> You understand and agree that, in the event that we receive a formal
>> complaint, notice of claim or UDRP, that we will have the right to
>> disable
>> the Whois Privacy Service pending final disposition of the matter.
>>
>>
>>
>>
>> Regards,
>>
>> Sara Scruton | Compliance OfficerÂ | Tucows.com
>> 96 Mowat Ave. | Toronto | ON | Canada | M6K 3M1
>> Phone: 416.535.0123 x1655
>> Fax: 416-531-2516

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>> Toll Free Intl: +800.371.6992

>> Email: disputes@opensrs.org

>> http://opensrs.com/

>>

>>

>>

>>

>>

----- Original Message

>> -----

>> Subject: Ross University School of Medicine et al. v. Behzad Amini et

>> al-

>> ORDER REGARDING WEBSITE REGISTRATIONS

>> From: "James P. Flynn" <JFlynn@ebglaw.com>

>> Date: Wed, October 16, 2013 7:47 pm

>> To: "disputes@opensrs.net" <disputes@opensrs.net>

>> Cc:

"William S. Gyves" <WGyves@ebglaw.com>

>>

>>

>> To: TUCOWS

>>

>>

>> From: James P. Flynn, Esq.

>>

>>

>>

>> We are, as described below, contacting you concerning certain

>> websites,

>> and serving on you a court order obtained. See attached.

>> Additionally,

>> part of the attachment is a service letter—the body of
which letter

>> has

>> also been copied below so as to provide you instructions as to the

>> entry

>> of this referenced order. This is being emailed to you at the address

>> provided at your website for service of court orders, as reflected in

>> attached image:

>>

>>

>>

>> [Description: Description: Description: Description:

>> cid:image002.jpg@01CECA86.EF18EE60]

>>

>>

>>

>> Hard copies also being sent to you at below address, but your actions

>> should be prompt and immediate following your receipt of these

>> defendant Behzad Amini containing the word
ÃƒÂ¢Ã¢ËšÃ...Ã...â€œRoss.ÃƒÂ¢Ã¢ËšÃ~Ã,Ã We also
include

>> summonses concerning
such websites as defendants in rem.

>>

>> We highlight for your attention the requirement that you:

>>

>> a.Ã,Ã Ã,Ã Ã,Ã Identify to plaintiffsÃƒÂ¢Ã¢ËšÃ...Ã¢ËžÃ¢ counsel
each and every URL
registered

>> to,

>> by, or for defendant Behzad Amini containing the word
ÃƒÂ¢Ã¢ËšÃ...Ã...â€œRossÃƒÂ¢Ã¢ËšÃ~;

>>

>> b.Ã,Ã Ã,Ã Ã,Ã immediately
turn over and transfer the Offending, Infringing

>> Sites

>> to the undersigned counsel;

>>

>> c.Ã,Ã Ã,Ã Ã,Ã cancel all links contained in the Offending, Infringing
>> Sites; and

>>

>> d.Ã,Ã Ã,Ã Ã,Ã return all the Offending, Infringing Sites to an inactive
>> status

>> pending a hearing on a preliminary injunction.

>>

>> Please be advised this Order was entered by a court of competent
>> jurisdiction having personal jurisdiction over defendants and subject
>> matter jurisdiction to hear this action.Ã,Ã Consistent with your
>> obligations

>> as Internet Corporation for Assigned Names and
Numbers

(ÃƒÂ¢Ã¢ËšÃ...Ã...â€œICANNÃƒÂ¢Ã¢ËšÃ...Ã¢ËžÃ¢ÃƒÂ¢Ã¢ËšÃ~)

>> accredited domain name registrar under the Uniform Domain Name Dispute

>> Resolution Policy (commonly referred
to as the ÃƒÂ¢Ã¢ËšÃ...Ã...â€œUDRPÃƒÂ¢Ã¢ËšÃ~), you are

>> required

>> under section 3.b of the UDRP upon the receipt of this Order to

>> effectuate

>> the above steps, including transfer.Ã,Ã To the extent that there are

>> forms

>> that you need completed or information that you need to be provided to

>> effectuate that transfer immediately, provide the necessary forms or

>> inquiries now.

>>

>> Please confirm receipt by return email, and provide at that time an
estimate as when each required step will be completed.Ã,Ã Should you

>> have

>> any questions, please do not hesitate to contact the undersigned.

>>

>> Very

truly yours,

>>

>>

>> James P. Flynn

>>

>> JF:mtk

>>

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Enclosures

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>> [EPSTEIN BECKER GREEN] <<http://www.ebglaw.com/>>

>> James P. Flynn | Bio<http://www.ebglaw.com/bio_JFlynn>

>> t 973.639.8285 | f 973.639.8931

>> JFlynn@ebglaw.com<<mailto:JFlynn@ebglaw.com>>

>>

>> One Gateway Center | Newark, NJ 07102

>> t 973.642.1900 | www.ebglaw.com<<http://www.ebglaw.com/>>

>>

>> Think Green. Please consider the environment before

you print this

>> message. Thank you.

>>

>> -----Original Message-----

>>

>>

>> From: device@ebglaw.com [mailto:device@ebglaw.com]

>> Sent: Wednesday, October 16, 2013 9:13 AM

>> To: James P. Flynn

>> Subject: Scan from a Xerox WorkCentre

>>

>>

>>

>> Please open the attached document.Ã,Ã It was scanned and sent to you

>> using a

>> Xerox WorkCentre.

>>

>>

>>
>> Attachment File Type: PDF
>>
>>
>>
>> WorkCentre Location: machine location not set
>>
>> Device Name: XRX0000AAF9A35C
>>
>>
>>
>>
>>
>> For more information on Xerox
products and solutions, please visit
>> <http://www.xerox.com>
>>
>>
>> CONFIDENTIALITY NOTE: This communication is intended only for the
>> person
>> or entity to which it is addressed and may contain information that is
>> privileged, confidential or otherwise protected from disclosure.
>> Dissemination, distribution or copying of this communication or the
>> information herein by anyone other than the intended recipient, or an
>> employee or agent responsible for delivering the message to the
>> intended
>> recipient, is prohibited.Ã,Ã If you have received this communication
in
>> error, please call the Help Desk of Epstein Becker & Green, P.C. at
>> (212)
>> 351-4701 and destroy the original message and all copies.
>>
To ensure compliance with requirements imposed by the IRS, we inform
>> you
>> that any U.S. federal tax advice contained in this communication
>> (including any attachments) is not intended or written to be used, and
>> cannot be used, for the purpose of (i) avoiding penalties under the
>> Internal Revenue Code or (ii) promoting, marketing or recommending to
>> another party any transaction or matter addressed herein.
>> Pursuant to the CAN-SPAM Act this communication may be considered an
>> advertisement or solicitation.Ã,Ã If you would prefer not to receive
>> future
>> marketing and promotional mailings, please submit your request via
>> email
>> to ebgus@ebglaw.com<mailto:ebgus@ebglaw.com> or via postal mail to
>> Epstein
>> Becker & Green, P.C. Attn: Marketing Department, 250 Park Avenue, New
>> York, NY 10177.Ã,Ã Be sure to include your email address if submitting
>> your
>> request via postal mail.EBGST041706
>> _____
>

EXHIBIT B

-----Original Message-----

From: Tucows Disputes [mailto:disputes@opensrs.org]
Sent: Monday, November 18, 2013 1:15 PM
To: James P. Flynn
Cc: William S. Gyves; Michael T. Keilty
Subject: Re: [Fwd: Re: [Fwd: Re: [Fwd: Ross University School of Medicine et al. v. Behzad Amini et al-- ORDER REGARDING WEBSITE REGISTRATIONS]]]

Hi James,

Thank you for your response.

When i originally emailed the legal documents to the end user i sent them to info@rossu.net, but the email bounced so i emailed the reseller, and the reseller told me to email green973271@yahoo.com and gave me his phone number 602-980-0900.

My guess is the reseller is the registrant of the domains. The reseller told me they were his domains, but the reseller info does not match up with the whois info, so the whois info might be inaccurate.

Thanks,

Sara

> Dear Sara
>
> Thank you for this update
>

> The restraints in the trial court's original order as I provided Tucows
> remain in place. The documents you attached are just some papers filed by
> defendant in our case. As for threats by "Mr. Green", I suspect that they
> come either from defendant Amini or someone working in concert with him,
> and such persons are restrained from operating any of these sites. Thus
> you are correct in maintaining them as locked as previously noted and
> ordered.

>

> If you get further communications concerning this, please advise me right
> away. Did Mr Green provide you contact information? If so please provide
> me his email, his phone number and any other information provided.

>

> Thanks

>

> Sent from my iPhone

>

>> On Nov 18, 2013, at 9:36 AM, "Tucows Disputes" <disputes@opensrs.org>

>> wrote:

>>

>> Hi James,

>>

>> We received the email below with attachments from the
>> registrant/reseller
>> of the domain names.

>>

>> I had a discussion on the phone with "Jeff Green" last week and he was
>> very angry and made me aware that he is now preparing to litigate
>> against

>> Tucows because we locked his domains.

>>

>> The domains will remained locked.

>>

>>

>> Regards,

>>

>> Sara Scruton | Compliance Officer | Tucows.com
>> 96 Mowat Ave. | Toronto | ON | Canada | M6K 3M1
>> Phone: 416.535.0123 x1655
>> Fax: 416-531-2516
>> Toll Free Intl: +800.371.6992
>> Email: disputes@opensrs.org
>> <http://opensrs.com/>

>>

>>

>>

> James P. Flynn | http://www.ebglaw.com/bio_JFlynn
> t 973.639.8285 | f 973.639.8931
> mailto:JFlynn@ebglaw.com
>
> One Gateway Center | Newark, NJ 07102
> t 973.642.1900 | <http://www.ebglaw.com/>

>
> Think Green. Please consider the environment before you print this
> message. Thank you.
> ----- Original Message -----
>
>> Subject: Re: [Fwd: Re: [Fwd: Ross University School of Medicine et al.
>> v.
>> Behzad Amini et al-- ORDER REGARDING WEBSITE REGISTRATIONS]]
>> From: "Jeff Green" <green973271@yahoo.com>
>> Date: Wed, November 13, 2013 9:22 pm
>> To: "Tucows Disputes" <disputes@opensrs.org>
>>
>>
>> See attached motion 1404, 12b(2), 12(b3)
>>
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>>
>> On , Jeff Green <green973271@yahoo.com> wrote:
>>
>> See Attached Response
>>
>>
>>
>> On Wednesday, November 13, 2013 1:11 PM, Jeff Green
>> <green973271@yahoo.com> wrote:
>>
>> 602-980-0900
>>
>>
>>
>>
>>
>> On Wednesday, November 13, 2013 12:58 PM, Tucows Disputes
>> <disputes@opensrs.org> wrote:
>>
>> Hello,
>>
>>
>> We received an email (below) from info@rossu.net, however the email
>> address bounced.
>>
>> Do you have a phone number that we could contact you so we can discuss
>> the
>> issue
>> ?
>>
>>
>>

>> Regards,

>>

>> Sara Scruton | Compliance OfficerÃ,Â | Tucows.com

>> 96 Mowat Ave. | Toronto | ON | Canada | M6K 3M1

>> Phone: 416.535.0123 x1655

>> Fax: 416-531-2516

>> Toll Free Intl: +800.371.6992

>> Email: disputes@opensrs.org

>> http://opensrs.com/

>>

>>

>>

>>

>>

>>

>>> We are filing a lawsuit against Tucows. We need the address to forward

>>> the legal document.

>>>

>>>

>>>

>>>

>>>

>>>> On 2013-10-16 15:48, Tucows Disputes wrote:

>>>> Hello,

>>>>

>>>> Please find court documents attached, and let us know how you will

>>>> proceed.

>>>>

>>>>

>>>> Please be aware that you have agreed to indemnify Tucows, and I have

>>>> taken

>>>> the privacy off the domains.

>>>>

>>>> <http://www.opensrs.com/docs/contracts/exhibita.htm>

>>>>

>>>> Section 13

>>>> INDEMNITY. You agree to release, indemnify, and hold Tucows, its

>>>> contractors, agents, employees, officers, directors and affiliates,

>>>> ICANN,

>>>> the applicable registries and their respective directors, officers,

>>>> employees, agents and affiliates harmless from all liabilities, claims

>>>> and

>>>> expenses, including attorney's fees, of third parties arising out of

>>>> or

>>>> relating to the registration or use of the domain name registered in

>>>> your

>>>> name, whether used by yourself, licensed to a third party or pursuant

>>>> to

>>>> the Whois Privacy Service, including without limitation infringement

>>>> by

>>>> you or a third party with access to your Account

>> Identifier and

>>> Password.

>>> You also agree to release, indemnify and hold us harmless pursuant to

>>> the

>>> terms and conditions contained in the applicable Dispute Policy. When

>>> we

>>> are threatened with suit by a third party, we may seek written

>>> assurances

>>> from you concerning your promise to indemnify us; your failure to

>>> provide

>>> those assurances may be considered by us to be a breach of your

>>> Agreement

>>> and may result in the suspension or cancellation of your domain name.

>>> This

>>> indemnification obligation will survive the termination or expiration

>>> of

>>> this Agreement.

>>>

>>> **Section 22 WHOIS PRIVACY SERVICE**

>>>

>>> Right to Suspend and Disable. We shall have the right, at our sole

>>> discretion and without liability to you or any of your

>> Contacts,

>>> suspend

>>> or cancel your domain name and to reveal Registrant and Contact Whois

>>> Information in certain circumstances, including but not limited to the

>>> following: (i) when required by law; (ii) in the good faith belief

>>> that

>>> disclosure is necessary to further determination of an alleged breach

>>> of a

>>> law; (iii) to comply with a legal process served upon Tucows; (iv) to

>>> resolve any and all third party claims including but not limited to

>>> ICANN's or a Registry's dispute resolution policy; (v) to avoid

>>> financial

>>> loss or legal liability (v) to avoid financial loss or legal

>>> liability;

>>> (vi) if we believe that you

>> or one of your Contacts is using the Whois

>>> Privacy Service to conceal involvement with illegal, illicit,

>>> objectionable or harmful activities; or (vii) to

>> transmit SPAM,

>>> viruses,

>>> worms or other harmful computer programs.

>>> You understand and agree that, in the event that we receive a formal

>>> complaint, notice of claim or UDRP, that we will have the right to

>>> disable

>>> the Whois Privacy Service pending final disposition of the matter.

>>>

>>>

>>>

>>> Regards,

>>>

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>>> Sara Scruton | Compliance Officer | Tucows.com

>>> 96 Mowat Ave. | Toronto | ON | Canada | M6K 3M1

>>> Phone: 416.535.0123 x1655

>>> Fax: 416-531-2516

>>> Toll Free Intl: +800.371.6992

>>> Email: disputes@opensrs.org

>>> http://opensrs.com/

>> ----- Original Message

>>>

>>> Subject: Ross University School of Medicine et al. v. Behzad Amini et

>>> al--

>>> ORDER REGARDING WEBSITE REGISTRATIONS

>>> From: "James P. Flynn" <JFlynn@ebglaw.com>

>>> Date: Wed, October 16, 2013 7:47 pm

>>> To: "disputes@opensrs.net" <disputes@opensrs.net>

>>> Cc:

>>> "William S. Gyves" <WGyves@ebglaw.com>

>> -----

>>>

>>> To: TUCOWS

>>>

>>>

>>>

>>> From: James P. Flynn, Esq.

>>>

>>>

>>>

>>> We are, as described below, contacting you concerning certain

>>> websites,

>>> and serving on you a court order obtained. See attached.

>>> Additionally,

>>> part of the attachment is a service letter—the body of
>> which letter

>>> has

>>> also been copied below so as to provide you instructions as to the

>>> entry

>>> of this referenced order. This is being emailed to you at the

>>> address

>>> provided at your website for service of court orders, as reflected in

>>> attached image:

>>>

>>>

>>>

>>> [Description: Description: Description: Description:

>>> cid:image002.jpg@01CECA86.EF18EE60]

>>>

>>>

>>>

>>> Hard copies also being sent to you at below address, but your actions

>>> should be prompt and immediate following your receipt of these

>>> electronic

>>> copies

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>> October 16, 2013

>>>

>>> VIA EMAIL disputes@opensrs.net AND OVERNIGHT DELIVERY

>>>

>>> Registrar of Record-TUCOWS, INC

>>> 96 Mowat Avenue,

>>>

>>> Toronto, Ontario,

>>>

>>> M6K 3M1, Canada

>>>

>>>

>>> Re:

>>>

>>>

>>> Ross University School of Medicine et al. v. Behzad Amini et al.

>>>

>>> Case No.: 13

>> Civ. 06121

>>>

>>>

>>>

>>> Dear Sir/Madam:

>>>

>>> We represent plaintiffs in the above-captioned action.Ã,Ã Enclosed

>>> please

>>> find a copy of the Order (ÃfÃcÃc šÃ~Ã...â€œOrderÃfÃcÃc šÃ~) that was

>> entered this

>> morning by

>>> the

>>> Hon. Anne E. Thompson of the United States District Court, District of

>>> New

>>> Jersey, which we direct to you as the registrar of record of the

>>> Offending, Infringing Sites defined in that Order. The named

>>> Offending,

>>> Infringing Sites defined in that Order as (1)

>>> www.RossU.net<<http://www.rossu.net/>>,

>>> www.RossMedicalSchool.org<<http://www.rossmedicalschool.org/>>, (2)

>>> www.RossMedSchool.com<<http://www.rossmedschool.com/>>, and (3)

>>> www.JohnDoeRossInfringingSites1-20.doe<<http://www.johndoerossinfringsites1-20.doe/>>,

>>> the final item (3) representing every other URL registered to, by, or

>>> for

>>> defendant Behzad Amini containing the word

>> ÃfÃcÃc šÃ~Ã...â€œRoss.ÃfÃcÃc šÃ~Ã,Ã We also

>> include

>>> summonses concerning

>> such websites as defendants in rem.

>>>

>>> We highlight for your attention the requirement that you:

>>>

>>> a.Â,Â Â,Â Â Identify to plaintiffsÃ¢Ã¢€šÃ–Ã¢Ã¢€žÃ¢ counsel

>> each and every URL

>> registered

>>> to,

>>> by, or for defendant Behzad Amini containing the word

>> ÃƒÃ¢Ã¢€šÃ–Ã...â€œRossÃƒÃ¢Ã¢€šÃ–;

>>>

>>> b.Â,Â Â,Â Â immediately

>> turn over and transfer the Offending, Infringing

>>> Sites

>>> to the undersigned counsel;

>>>

>>> c.Â,Â Â,Â Â cancel all links contained in the Offending,

>>> Infringing

>>> Sites; and

>>>

>>> d.Â,Â Â,Â Â return all the Offending, Infringing Sites to an

>>> inactive

>>> status

>>> pending a hearing on a preliminary injunction.

>>>

>>> Please be advised this Order was entered by a court of competent

>>> jurisdiction having personal jurisdiction over defendants and subject

>>> matter jurisdiction to hear this action.Â,Â Consistent with your

>>> obligations

>>> as Internet Corporation for Assigned Names and

>> Numbers

>> (ÃƒÃ¢Ã¢€šÃ–Ã...â€œICANNÃƒÃ¢Ã¢€šÃ–Ã¢Ã¢€žÃƒÃ¢Ã¢€šÃ–)

>>> accredited domain name registrar under the Uniform Domain Name Dispute

>>> Resolution Policy (commonly referred

>> to as the ÃƒÃ¢Ã¢€šÃ–Ã...â€œUDRPÃƒÃ¢Ã¢€šÃ–), you are

>>> required

>>> under section 3.b of the UDRP upon the receipt of this Order to

>>> effectuate

>>> the above steps, including transfer.Â,Â To the extent that there are

>>> forms

>>> that you need completed or information that you need to be provided to

>>> effectuate that transfer immediately, provide the necessary forms or

>>> inquiries now.

>>>

>>> Please confirm receipt by return email, and provide at that time an

>>> estimate as when each required step will be completed.Â,Â Should you

>>> have

>>> any questions, please do not hesitate to contact the undersigned.

>>>

>>> Very

>> truly yours,

>>>

>>>

>>> James P. Flynn

>>>

>>> JF:mtk

>> Enclosures

>>>

>>>

>>>

>>>

>>>

>>>

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>>>

>>>

>>>

>>>

>>>

>>>

>>> [EPSTEIN BECKER GREEN] <<http://www.ebglaw.com/>>

>>> James P. Flynn | Bio<http://www.ebglaw.com/bio_JFlynn>

>>> t 973.639.8285 | f 973.639.8931

>>> JFlynn@ebglaw.com<mailto:JFlynn@ebglaw.com>

>>>

>>> One Gateway Center | Newark, NJ 07102

>>> t 973.642.1900 | www.ebglaw.com<<http://www.ebglaw.com/>>

>>>

>>> Think Green. Please consider the environment before

>> you print this

>>> message. Thank you.

>>>

>>> -----Original Message-----

>>>

>>>

>>> From: device@ebglaw.com [mailto:device@ebglaw.com]

>>> Sent: Wednesday, October 16, 2013 9:13 AM

>>> To: James P. Flynn

>>> Subject: Scan from a Xerox WorkCentre

>>>

>>>

>>>

>>> Please open the attached document.Ã„Ã It was scanned and sent to you

>>> using a

>>> Xerox WorkCentre.

>>>

>>>

>>>

>>> Attachment File Type: PDF

>>>

>>>

>>>

>>> WorkCentre Location: machine location not set

>>>

>>> Device Name: XRX0000AAF9A35C

>>>

>>>

>>>

>>>

>>> For more information on Xerox

>> products and solutions, please visit

>>> <http://www.xerox.com>

>>>

>>>

>>> CONFIDENTIALITY NOTE: This communication is intended only for the
>>> person

>>> or entity to which it is addressed and may contain information that is
>>> privileged, confidential or otherwise protected from disclosure.

>>> Dissemination, distribution or copying of this communication or the
>>> information herein by anyone other than the intended recipient, or an
>>> employee or agent responsible for delivering the message to the
>>> intended

>>> recipient, is prohibited.Ã,Ã If you have received this communication
>> in

>>> error, please call the Help Desk of Epstein Becker & Green, P.C. at
>>> (212)

>>> 351-4701 and destroy the original message and all copies.

>> To ensure compliance with requirements imposed by the IRS, we inform
>>> you

>>> that any U.S. federal tax advice contained in this communication
>>> (including any attachments) is not intended or written to be used, and
>>> cannot be used, for the purpose of (i) avoiding penalties under the
>>> Internal Revenue Code or (ii) promoting, marketing or recommending to
>>> another party any transaction or matter addressed herein.

>>> Pursuant to the CAN-SPAM Act this communication may be considered an
>>> advertisement or solicitation.Ã,Ã If you would prefer not to receive

>>> future

>>> marketing and promotional mailings, please submit your request via
>>> email

>>> to ebgus@ebglaw.com<<mailto:ebgus@ebglaw.com>> or via postal mail to
>>> Epstein

>>> Becker & Green, P.C. Attn: Marketing Department, 250 Park Avenue, New
>>> York, NY 10177.Ã,Ã Be sure to include your email address if

>>> submitting

>>> your

>>> request via postal mail.EBGST041706

>>>

>> <untitled-[1.2].html>

>> <MOL-1404.pdf>

>> <Exhibits.pdf>

>> <MOL-12(b).pdf>

>

>

>

>

EXHIBIT C

-----Original Message-----

From: Ben Amini [<mailto:bccpda@yahoo.com>]
Sent: Monday, October 28, 2013 8:22 AM
To: James P. Flynn
Subject: Re: Amini

Thank you Mr. Flynn. I'll be waiting by my phone. 602-980-0900. Please ask the judge to add me for telephonic participation. Thanks

Sent from my iPhone

On Oct 28, 2013, at 5:19 AM, "James P. Flynn" <JFlynn@ebglaw.com> wrote:

> I already left house for court but will advise court of your submission

>

> Sent from my iPhone

>

>> On Oct 28, 2013, at 7:45 AM, "Ben Amini" <bccpda@yahoo.com> wrote:

>>

>> Mr. Flynn,

>>

>> Attach is my verification. Caould you kindly print a copy for yourself and one copy for Judge Thompson. I totally forgot to sent this part to you and the court.

>>

>>

>> Thanks a thousand.

> James P. Flynn | http://www.ebglaw.com/bio_JFlynn

> t 973.639.8285 | f 973.639.8931

> <mailto:JFlynn@ebglaw.com>

>

> One Gateway Center | Newark, NJ 07102

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> t 973.642.1900 | <http://www.ebglaw.com/>

>

> Think Green. Please consider the environment before you print this message. Thank you.

> -----

>

>> On Fri, 10/25/13, James P. Flynn <JFlynn@ebglaw.com> wrote:

>>

>> Subject: Re: Amini

>> To: "Ben Amini" <bccpda@yahoo.com>

>> Cc: "William S. Gyves" <WGyves@ebglaw.com>

>> Date: Friday, October 25, 2013, 1:37 PM

>>

>> Mr Amini,

>>

>> I do not object to you presenting your legal arguments

>> telephonically on Monday October 28 at 10:30 am, the time

>> and date noted in the Order to Show Cause.

>>

>>

>> Sent from my iPad

>>

>>> On Oct 25, 2013, at 1:25 PM, "Ben Amini" <bccpda@yahoo.com>

>>> wrote:

>>>

>>> Thank you Mr. Flynn. I asked the court to have a

>> telephonic representation on 28th. and waiting for their

>> response.

>>>

>>> Ben

>> James P. Flynn | http://www.ebglaw.com/bio_JFlynn

>> t 973.639.8285 | f 973.639.8931

>> <mailto:JFlynn@ebglaw.com>

>>

>> One Gateway Center | Newark, NJ 07102

>> t 973.642.1900 | <http://www.ebglaw.com/>

>>

>> Think Green. Please consider the environment before you

>> print this message. Thank you.

>> -----

>>

>>> On Fri, 10/25/13, James P. Flynn <JFlynn@ebglaw.com>

>>> wrote:

>>>

>>> Subject: FW: Amini

>>> To: "bccpda@yahoo.com"

>> <bccpda@yahoo.com>

>>> Cc: "William S. Gyves" <WGyves@ebglaw.com>

>>> Date: Friday, October 25, 2013, 8:09 AM

>>>

>>>

>>>

>>>

>>>

>>>

>>>

>>>

>>>

>>>

>>>

>>>

>>>

>>> Dear Mr.

>>> Amini,

>>>

>>> Please find copies of the reply

>>> papers filed this morning.

>>>

>>> Jim

>>>

>>>

>>>

>>>

>>>

>>>

>>>

>>>

>>>

>>>

>>> James P. Flynn | Bio

>>>

>>>

>>> t 973.639.8285 | f

>>> 973.639.8931

>>>

>>> JFlynn@ebglaw.com

>>>

>>>

>>> One Gateway Center | Newark, NJ

>>> 07102

>>>

>>> t 973.642.1900 | www.ebglaw.com

>>>

>>>

>>>

>>> Think

>>> Green. Please consider the environment before you

>> print

>>> this message. Thank you.

>>>

>>>

>>>
>>>
>>>
>>>
>>>
>>>

>>> CONFIDENTIALITY NOTE: This communication is
>> intended only for the person or entity to which it is
>> addressed and may contain information that is
>> privileged,
>>> confidential or otherwise protected
>>> from disclosure. Dissemination,
>> distribution or
>>> copying of this communication or the information herein
>> by
>>> anyone other than the intended recipient, or an
>> employee or
>>> agent responsible for delivering the message to the
>> intended
>>> recipient, is prohibited. If
>>> you have received this communication in error,
>> please call
>>> the Help Desk of Epstein Becker & Green, P.C. at
>> (212)
>>> 351-4701 and destroy the original message and all
>>> copies.

>>>
>>> To ensure
>>> compliance with requirements imposed by the IRS, we
>> inform
>>> you that any U.S. federal tax advice contained in this
>>> communication (including any attachments) is not
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>>> written to
>>> be used, and cannot be used, for the purpose of
>> (i)
>>> avoiding penalties under the Internal Revenue Code or
>> (ii)
>>> promoting, marketing or recommending to another party
>> any
>>> transaction or matter addressed herein.

>>>
>>> Pursuant to
>>> the CAN-SPAM Act this communication may be considered
>> an
>>> advertisement or solicitation. If you would
>> prefer not
>>> to receive future marketing and promotional mailings,
>> please
>>> submit your
>>> request via email to ebgus@ebglaw.com or

>> via postal mail to Epstein Becker
>> & Green, P.C. Attn: Marketing
>> Department, 250 Park Avenue, New York, NY
>> 10177. Be
>> sure to include your email address if submitting your
>> request via postal mail.EBGST041706
>> <Verification.pdf>
>
>
>

EXHIBIT D

**U.S. District Court
District of New Jersey [LIVE] (Trenton)
CIVIL DOCKET FOR CASE #: 3:13-cv-06121-AET-TJB**

ROSS UNIVERSITY SCHOOL OF MEDICINE et al v.
AMINI et al
Assigned to: Judge Anne E. Thompson
Referred to: Magistrate Judge Tonianne J. Bongiovanni
Cause: 15:1125 Trademark Infringement (Lanham Act)

Date Filed: 10/16/2013
Jury Demand: None
Nature of Suit: 840 Trademark
Jurisdiction: Federal Question

Plaintiff

**ROSS UNIVERSITY SCHOOL OF
MEDICINE**

represented by **JAMES P. FLYNN**
EPSTEIN, BECKER & GREEN,
PC
ONE GATEWAY CENTER
NEWARK, NJ 07102-5311
(973) 642-1900¹²
Fax: 973-642-0099¹²
Email: jflynn@ebglaw.com
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

Plaintiff

**GLOBAL EDUCATION INTERNATIONAL,
INC.**

represented by **JAMES P. FLYNN**
(See above for address)
LEAD ATTORNEY
ATTORNEY TO BE NOTICED

V.

Defendant

BEHZAD AMINI

represented by **BEHZAD AMINI**
13835 N. TATUM BLVD NO.9-
280
PHOENIX, AZ 85032
602-980-0900¹²
Email: bccpda@yahoo.com
PRO SE

Defendant

WWW.ROSSU.NET

Defendant

WWW.ROSSMEDICALSCHOOL.ORG

Defendant

WWW.ROSSMEDSCHOOL.COM

Defendant

WWW.JOHNDOEROSSINFRINGINGSITES1-20.DOE

Date Filed	#	Docket Text
10/16/2013	<u>1</u>	COMPLAINT against BEHZAD AMINI, WWW.JOHNDOEROSSINFRINGINGSITES1-20.DOE, WWW.ROSSMEDICALSCHOOL.ORG, WWW.ROSSMEDSCHOOL.COM, WWW.ROSSU.NET (Filing and Admin fee \$ 400 receipt number TRE037247), filed by ROSS UNIVERSITY SCHOOL OF MEDICINE, GLOBAL EDUCATION INTERNATIONAL, INC.. (Attachments: # <u>1</u> Civil Cover Sheet, # <u>2</u> Exhibit A to I of Complaint, # <u>3</u> Proposed OTSC with TRO, # <u>4</u> Memorandum of Law in Support of TRO)(jjc) (Entered: 10/16/2013)
10/16/2013	<u>2</u>	Corporate Disclosure Statement by GLOBAL EDUCATION INTERNATIONAL, INC., ROSS UNIVERSITY SCHOOL OF MEDICINE identifying DEVRY INC. as Corporate Parent. (jjc) (Entered: 10/16/2013)
10/16/2013	<u>3</u>	SUMMONS ISSUED as to BEHZAD AMINI, WWW.ROSSMEDICALSCHOOL.ORG, WWW.ROSSMEDSCHOOL.COM, WWW.ROSSU.NET Attached is the official court Summons, please fill out Defendant and Plaintiffs attorney information and serve. Issued By *JAWEIA CAMPBELL* (jjc) (Entered: 10/16/2013)
10/16/2013	<u>4</u>	AO120 Patent/Trademark Form filed. (jjc) (Entered: 10/16/2013)
10/16/2013	<u>5</u>	Minute Entry for proceedings held before Judge Anne E. Thompson: Application by plaintiffs for an Order to Show Cause with Temporary Restraints. Granted, (Show Cause Hearing set for 10/28/2013 10:30 AM in Trenton - Courtroom 4W before Judge Anne E. Thompson.). (Court Reporter/Recorder M. Kalbach.) (jb,) (Entered: 10/17/2013)
10/16/2013	<u>6</u>	ORDER TO SHOW CAUSE(Show Cause Hearing set for 10/28/2013 10:30 AM in Trenton - Courtroom 4W before Judge Anne E. Thompson.), TEMPORARY RESTRAINING ORDER. Signed by Judge Anne E. Thompson on 10/16/13. (jb,) (Entered: 10/17/2013)
10/17/2013		Minute Entry for proceedings held before Judge Anne E. Thompson: Telephone Conference held on 10/17/2013. Plaintiff to attend show cause hearing scheduled for 10/28/13 @ 10:30 a.m. via telephone. (Court Reporter/Recorder M. Kalbach.) (jb,) (Entered: 10/17/2013)
10/22/2013	<u>7</u>	AFFIDAVIT of Service for (1) Order to Show Cause with Temporary Restraints; (2) Verified Complaint; (3) Exhibits to Verified Complaint; (4) Brief in Support of Request for Injunctive Relief (5) Civil Cover Sheet; (6) Rule 7.1 Disclosure Statement; and (7) Summons served on Behzad Amini on October 16, 2014, filed by GLOBAL EDUCATION INTERNATIONAL, INC., ROSS UNIVERSITY SCHOOL OF MEDICINE. (FLYNN, JAMES) (Entered: 10/22/2013)

10/24/2013	<u>8</u>	Consent and Registration Form from Behzad Amini to receive documents electronically. (kas,) (Entered: 10/24/2013)
10/24/2013	<u>9</u>	RESPONSE to Plaintiff's Verified Motion for Preliminary Injunction.(kas,) (Additional attachment(s) added on 10/24/2013: # <u>1</u> Exhibit, # <u>2</u> Certificate of Service) (kas). (Entered: 10/24/2013)
10/25/2013	<u>10</u>	REPLY to Response re <u>9</u> Response (NOT Motion). (Attachments: # <u>1</u> Declaration of James P. Flynn, # <u>2</u> Text of Proposed Order, # <u>3</u> Certificate of Service)(FLYNN, JAMES) (Entered: 10/25/2013)
10/28/2013	<u>11</u>	ORDER Providing for Continuing Injunction. Signed by Judge Anne E. Thompson on 10/28/2013. (kas,) (Entered: 10/29/2013)
10/28/2013	<u>12</u>	Minute Entry for proceedings held before Judge Anne E. Thompson: Show Cause Hearing held on 10/28/2013. Ordered that restraints previously imposed on 10/16/13 remain in effect. (Court Reporter/Recorder M. Kalbach.) (jb,) (Entered: 10/29/2013)
11/01/2013	<u>13</u>	MOTION to Dismiss Plaintiff's Complaint by BEHZAD AMINI. (Attachments: # <u>1</u> Exhibit, # <u>2</u> Declaration, # <u>3</u> notification, # <u>4</u> Certificate of Service)(kas,) (Entered: 11/01/2013)
11/01/2013		Set Deadlines as to <u>13</u> MOTION to Dismiss. Motion set for 12/2/2013 before Judge Anne E. Thompson. The motion will be decided on the papers. No appearances required unless notified by the court. (kas,) (Entered: 11/01/2013)
11/01/2013	<u>14</u>	MOTION to Transfer Case to Arizona by BEHZAD AMINI. (Attachments: # <u>1</u> notification, # <u>2</u> Declaration, # <u>3</u> Exhibit, # <u>4</u> Certificate of Service)(kas,) (Entered: 11/01/2013)
11/01/2013		Set Deadlines as to <u>14</u> MOTION to Transfer Case to Arizona. Motion set for 12/2/2013 before Judge Anne E. Thompson. The motion will be decided on the papers. No appearances required unless notified by the court. (kas,) (Entered: 11/01/2013)
11/01/2013	<u>15</u>	AMENDED RESPONSE to Plaintiff's Verified Motion for Preliminary Injunction (Attachments: # <u>1</u> cover letter, # <u>2</u> Exhibit, # <u>3</u> Certificate of Service)(kas,) (Entered: 11/01/2013)
11/04/2013	<u>16</u>	Letter from James P. Flynn to The Honorable Anne E. Thompson, U.S.D.J. regarding improper supplemental briefing. (Attachments: # <u>1</u> Text of Proposed Order)(FLYNN, JAMES) (Entered: 11/04/2013)
11/07/2013	<u>17</u>	Letter from Behzad Amini. (Attachments: # <u>1</u> Exhibit a, # <u>2</u> Exhibit b, # <u>3</u> Exhibit c)(kas,) (Entered: 11/07/2013)
11/18/2013	<u>18</u>	MEMORANDUM in Opposition filed by GLOBAL EDUCATION INTERNATIONAL, INC., ROSS UNIVERSITY SCHOOL OF MEDICINE re <u>13</u> MOTION to Dismiss, <u>14</u> MOTION to Transfer Case to Arizona (Attachments: # <u>1</u> Declaration of Andrew Andress, # <u>2</u> Certificate of Service)(FLYNN, JAMES) (Entered: 11/18/2013)

PACER Service Center			
Transaction Receipt			
11/19/2013 12:44:55			
PACER Login:	eb1068	Client Code:	75946-022-234
Description:	Docket Report	Search Criteria:	3:13-cv-06121-AET-TJB Start date: 1/1/1970 End date: 11/19/2013
Billable Pages:	3	Cost:	0.30

EXHIBIT E

EPSTEIN BECKER & GREEN, P.C.
One Gateway Center
Newark, New Jersey 07102
Telephone: (973) 642-1900
Facsimile: (973) 642-0099
Attorneys for Plaintiffs
Ross University School of Medicine and
Global Education International, Inc.

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

ROSS UNIVERSITY SCHOOL OF
MEDICINE and GLOBAL EDUCATION
INTERNATIONAL, INC.,

Civil Action No. 3-13-cv-06121

**ORDER OF
PRELIMINARY INJUNCTION**

Plaintiffs,

v.

BEHZAD AMINI, WWW.ROSSU.NET,
WWW.ROSSMEDICALSCHOOL.ORG,
WWW.ROSSMEDSCHOOL.COM and
WWW.JOHNDOEROSSINFRINGEMENTSITES1
-20.DOE

Defendants.

This matter comes before the Court upon the application of plaintiffs Ross University School of Medicine (“RUSM”) and Global Education International, Inc. (collectively “Plaintiffs”) pursuant to Federal Rule of Civil Procedure 65, for entry of a preliminary injunction against defendants Behzad Amini, www.RossU.net, www.RossMedicalSchool.org, www.RossMedSchool.com and www.JohnDoeRossInfringingSites1-20.doe (collectively “Defendants”), and the Court having considered the submissions of the parties, and both parties having appeared for oral argument on October 28, 2013,

IT IS on this ____ day of October, 2013,

HEREBY ORDERED THAT:

1. Defendant Behzad Amini is hereby required to immediately identify to Plaintiffs' counsel and the Court each and every URL he has registered that contains the word "Ross," and Defendant Behzad Amini will be considered in violation of this Order if same has not occurred within three (3) business days.

2. Defendants, and all those acting in concert with Defendants, including but not limited to domain name registrars and hosts such as TUCOWS, Inc., Launchingpad.com, HostGator.com LLC, and Unified Layer, are hereby enjoined and restrained during the pendency of this litigation or until further Order of this Court, from:

- a. Directly or indirectly publishing or disseminating, whether through the Offending, Infringing Sites or other outlets or mediums, any statements that would disparage, reflect negatively upon or otherwise call into question RUSM's business operations, products, services, integrity, reputation or business relationships, or the business operations, products, services, integrity, reputation or business relationships of RUSM and/or any of its parent, subsidiary or any other affiliated entities, and any and all of its or their former and current members, principals, directors, officers, shareholders, employees, agents, attorneys, contractors, representatives, affiliates, predecessors, successors and assigns, including but not limited to any further disparaging communications with representatives of RUSM's affiliated institutions or governmental regulators or any of recipients of the emails identified in the Verified Complaint at paragraphs 65, 68, 78 and 82;
- b. Using the Offending, Infringing Sites in any manner; and
- c. Attempting to sell, selling or transferring any interest in the Offending, Infringing Sites other than in conformance with paragraphs 3 and 4 of this Order.

3. Defendants, and all those acting in concert with Defendants, including but not limited to domain name registrars and hosts such as TUCOWS, Inc., Launchingpad.com, HostGator.com LLC, and Unified Layer, are hereby directed to

- a. Immediately transfer registration of the Offending, Infringing Sites to Plaintiffs, and Defendant Behzad Amini will be considered in violation of this Order if same has not occurred within three (3) business days; and
 - b. Cancel immediately and permanently the links on defendant Amini's webpage through the Offending, Infringing Sites URLs, and Defendant Behzad Amini will be considered in violation of this Order if same has not occurred within three (3) business days;
4. Each and every applicable registrar with which any of the Offending, Infringing Sites are registered, including but not limited to domain name registrars and hosts such as TUCOWS, Inc., Launchingpad.com, HostGator.com LLC, and Unified Layer, are hereby directed to immediately deem as forfeited or cancelled each domain name for the Offending, Infringing Sites and to transfer of the domain name registrations for same to Plaintiffs, consistent with 15 U.S.C. § 1125(d)(1)(C) within three (3) business days of actual notice of this Order being delivered to such registrars and hosts, notice via electronic means being deemed sufficient service of this Order to comply with applicable rules and due process.

5. Plaintiffs shall not be required to post a bond.

Hon. Anne E. Thompson, U.S.D.J.

EXHIBIT E

William S. Gyves

From: Ben Amini <bccpda@yahoo.com>
Sent: Tuesday, December 03, 2013 2:41 PM
To: William S. Gyves
Subject: Re:

<http://www.bloomberg.com/news/2013-12-03/for-profit-caribbean-medical-schools-use-federal-funds-loophole.html>

This is how we fight your client. Not by paying some Caribbean news outlet to publish lies in order to tarnish my reputation.

I will fight your client as long as I live. No one and no court can ban my free speech against your client. Reporters in Iran are put in prison for expressing their free speech and if I have to be put in prison in United States for expressing my free speech against your client, then let it be. My story will get all over news, both in US and in Iran.